

AFFIDAVIT

I, Jason R. Roth, having been duly sworn, depose and state:

1. I am a United States Postal Inspector, having been so employed since February 23, 2013. I am presently assigned to the Cincinnati Field Office, Pittsburgh Division of the United States Postal Inspection Service (USPIS) with investigative responsibility for southwest Ohio and northern Kentucky. Part of my investigative responsibility involves the use of the United States Mail in the illegal transporting of narcotics and other dangerous controlled substances and financial proceeds relating thereto.
2. Your Affiant completed United States Postal Inspection Service Basic Training in May 2013. The training involved narcotic investigation techniques, chemical field tests and training in the detection and identification of controlled substances being transported in the United States Mail. In addition to this formal training, your Affiant has worked since May 2013 with various federal, state and local law enforcement agencies in the investigation of the transportation of illegal drugs and their identification.
3. This Affidavit is made in support of a search warrant for the following property, namely a package associated with the following United States Postal Service (USPS) Priority Mail, Tracking Number:

a. **9505 5125 9199 9273 2690 24** (the "Package")

This Affidavit is made in support of a warrant to search the Package for evidence of a crime as well as contraband, fruits of a crime or other items illegally possessed in relation to the following offense:

- a. Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, § 841.

Because this Affidavit is submitted in support of the application of the United States to search the Package, it does not include every fact known concerning this investigation. I have set forth facts and circumstances that I have relied upon to establish probable cause to justify the issuance of a warrant to search the Package. The Package is currently being held at the USPIS Cincinnati Field Office.

4. Your Affiant has become aware that drug traffickers frequently use Priority Mail Express and/or Priority Mail, services offered by the USPS, to transport narcotics and other dangerous controlled substances. As a result of investigations and successful controlled substance prosecutions where Priority Mail Express and/or Priority Mail were used, your Affiant has learned of certain characteristics indicative of other Priority Mail Express and/or Priority Mail items previously identified as containing narcotics or other dangerous controlled substances. Some of these characteristics include, but are not necessarily limited to or used on every occasion - false or non-existent return address,

addressee is not known to receive mail at the listed delivery address, the package is heavily taped, the package is mailed from a known drug source location, labeling information contains misspellings, the label contains an illegible waiver signature, unusual odors emanating from the package, and the listed address is located in an area of known or suspected drug activity.

5. On or about October 2, 2019, your Affiant identified and intercepted the Package from the Cincinnati Network Distribution Center, Cincinnati, OH.

The Package is further described as:

Priority Mail, Tracking Number: 9505 5125 9199 9273 2690 24

Package is in a white, Priority Mail Flat Rate box weighing approximately 2 pound. Postage paid for was \$14.35.

Sender: LUIS GARCIA
6511 GREENLEAF AVE.
WHITTIER, CA 90601

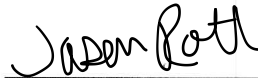
Addressee: JAKO MONTANA
5846 MILLBROOK DR.
MIDDLETOWN, OH 45042

6. Observation and USPS tracking information of the Package, by your Affiant, indicated it was mailed from the Montebello Post Office, Montebello, CA 90640.
7. The CLEAR database was researched by your Affiant regarding the listed return address of the Package: Luis Garcia, 6511 Greenleaf Ave., Whittier, CA 90601. CLEAR is a public record data investigative platform available exclusively to law enforcement and other government investigators about people and businesses. The information obtained from the system indicated there is no Luis Garcia associated with that address.
8. The CLEAR database was researched by your Affiant regarding the listed addressee of the Package: Jako Montana, 5846 Millbrook Dr., Middletown, OH 45042. The information obtained from the system indicated there is no Jako Montana associated with that address.
9. On or about October 2, 2019, your Affiant arranged for Deputy Nick Poole, Hamilton County Sheriff's Office, to utilize a narcotics canine to check the Package. Deputy Poole and his canine "Akim" are a currently certified narcotics team. The team is certified by the Ohio Peace Officer Training Commission and the Office of the Attorney General (Ohio). Deputy Poole reports that "Akim" passed all of his examinations and has successfully located hidden drugs in the past and therefore your Affiant considers "Akim" to be reliable. On the same date, your Affiant met Deputy Poole at the USPS Cincinnati

Field Office where the Package was placed in a separate office among several other similar packages and presented to narcotic canine, "Akim", who alerted positively to the presence or odor of a controlled substance upon the Package. Attached herewith, and incorporated by reference, is a photocopy of the narcotic canine handler's record of examination.

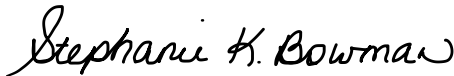
10. Based upon my experience and training, this information, along with the positive alert of narcotic canine "Akim" is indicative of the Package containing narcotics or proceeds relating thereof.
11. Based upon the information contained in this Affidavit, your Affiant believes that there is probable cause to believe that the Package will contain evidence and/or contraband, fruits of crime, or other items illegally possessed. Therefore, a search warrant to open the Package is requested.

Further, your Affiant sayeth naught.



Jason R. Roth
U.S. Postal Inspector

Subscribed and sworn to and before me this 2nd day of October, 2019



Stephanie K. Bowman
United States Magistrate Judge





United States Postal Inspection Service
Pittsburgh Division

OFFICER AFFIDAVIT

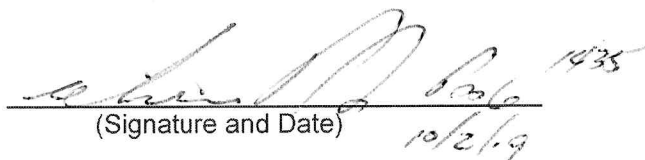
I, DEPUTY N. POOLE, AM, AND HAVE BEEN, EMPLOYED BY THE HAMILTON COUNTY SHERIFF'S OFFICE, SINCE 2004. AMONG OTHER DUTIES, I AM CURRENTLY THE ASSIGNED HANDLER OF NARCOTICS DETECTION CANINE "AKIM", WHICH IS TRAINED AND CERTIFIED IN THE DETECTION OF THE PRESENCE OR ODOR OF NARCOTICS DESCRIBED AS FOLLOWS:

Marijuana, Hashish, Cocaine, Heroin, Methamphetamines, Ecstasy

ON 10/2/2019, AT THE REQUEST OF POSTAL INSPECTOR J.R. ROTH I RESPONDED TO THE US POSTAL INSPECTION SERVICE CINCINNATI FIELD OFFICE WHERE "AKIM" DID ALERT TO AND INDICATE UPON THE FOLLOWING DESCRIBED ITEM:

USPS Priority Mail, Tracking Number: 9505 5125 9199 9273 2690 24, addressed to JAKO MONTANA, 5846 MILLBROOK DR., MIDDLETOWN, OH 45042, with a return address of LUIS GARCIA, 6511 GREENLEAF AVE., WHITTIER, CA 90601.

BASED ON MY TRAINING AND EXPERIENCE AND THAT OF "AKIM", I CONSIDER THE ABOVE DESCRIBED ITEM TO CONTAIN WITHIN OR UPON THE PRESENCE OR ODOR OF A NARCOTIC OR OTHER DANGEROUS CONTROLLED SUBSTANCE.

A handwritten signature and date, "10/2/19", written over a horizontal line. The signature is in cursive and the date is in a simple font.

(Signature and Date)